## ARNOLD & PORTER LLP

#### Kent A. Yalowitz

Kent.Yalowitz@aporter.com +1 212.715.1113 +1 212.715.1399 Fax 399 Park Avenue New York, NY 10022-4690

December 23, 2014

### VIA ECF AND HAND DELIVERY

Hon. George B. Daniels
United States District Judge
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: Sokolow, et al. v. Palestine Liberation Organization, et al. <u>Docket No. 04-CV-397 (GBD)(RLE)</u>

#### Dear Judge Daniels:

I write to inform the Court that plaintiffs have narrowed their deposition designations since the filing of the JPTO, and intend to offer selected testimony from the following six depositions during trial:

- 1. Mosaab Hassan Yousef taken on January 10, 2012 in this case;
- 2. the 30(b)(6) deposition of Salam Fayyad taken on March 9, 2010 in *Saperstein, et al. v. Palestinian Authority, et al.*;
- 3. Hasan Abu-Libdeh taken on June 16, 2010 in *Estate of Kleiman, et al. v. Palestinian Authority, et al.*;
- 4. Yasser Shaqbu'a taken on September 12, 2012 in *Shatsky, et al. v. Syrian Arab Republic, et al.*;
- 5. Hussein Al Sheikh taken on April 1, 2009 in *Saperstein, et al. v. Palestinian Authority, et al.*; and
- 6. Mazen Jadallah taken on June 15, 2010 in *Estate of Klieman, et al. v. Palestinian Authority, et al.*

I enclose the portions of the depositions that plaintiffs intend to offer as Exhibits A - F. The specific designations are highlighted for the Court's convenience.

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Hon. George B. Daniels December 23, 2014 Page 2

During the trial, we intend to show the jury videotapes of the Yousef and Fayyad deposition designations. For the remaining four depositions, we intend to have a member of our trial team read the questions and have a colleague, Irvin B. Nathan, read the relevant answers.

Respectfully,

cc: All ECF Counsel